

NOTICE OF FORFEITURE

Upon conviction of the offense alleged in Count One of this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 2253 (A) any matter which contains visual depictions of minors engaged in sexually explicit conduct; (B) any property constituting or traceable to gross profits or other proceeds obtained from the offenses; and (C) any property used or intended to be used to commit or to promote the commission of the offenses, or any property traceable to such property, including but not limited to the following: one thumbdrive, serial number BL0811NSSB, and one Samsung Galaxy S8+ cellphone, model SMG955UZKV, IMEI 357725085185248.

TRUE BILL

Dated: June 14, 2021

/s/ Grand Jury Foreperson
Grand Jury Foreperson

JOHN J. FARLEY
Acting United States Attorney

/s/ Kasey A. Weiland
Kasey A. Weiland
Assistant U.S. Attorney